

REPORT TITLE: Kirklees Air Quality Action Plan 2026-2031

Meeting:	Cabinet (draft report for Scrutiny)
Date:	October 2026 (Scrutiny 5 August 2026)
Cabinet Member (if applicable)	Cllr. Pipp Harvey
Key Decision Eligible for Call In	Yes Yes
Purpose of Report To inform Cabinet of progress with improvements in the Borough's outdoor air quality and seek approval to proceed with the submission of the Air Quality Action Plan 2026-2031, to Defra. The Air Quality Action Plan (AQAP) is required where a local authority identifies areas of non-compliance with the national air quality objectives (known as Air Quality Management Areas (AQMA)) and to draw up an action plan detailing additional measures and initiatives, designed to achieve compliance with Air Quality objectives in the remaining AQMAs. Improvements in air quality and meeting national air quality objectives, promotes the health of all residents and visitors to the Borough. The Council has a statutory duty to prepare and submit the AQAP to Defra in accordance with Section 83A of the Environment Act 1995 (as amended by the Environment Act 2021)	
Recommendations • Cabinet notes the contents of the report, the improvement in air quality across Kirklees and the technical evidence supporting the priorities contained in the Air Quality Action Plan 2026–2031. • Cabinet notes the statutory and public consultation undertaken, the representations received and the Council's response. • Cabinet approves the Kirklees Air Quality Action Plan 2026–2031 appended to the report. • Cabinet delegates authority to the Head of Public Protection to make any non-material textual, technical or presentational amendments required before submission or publication. • Cabinet authorises the Head of Public Protection to submit the adopted Air Quality Action Plan to the Department for Environment, Food and Rural Affairs through the Local Air Quality Management portal and to arrange for its publication on the Council's website.	
Reasons for Recommendations • Kirklees Council undertakes air quality monitoring across the Borough on a continuous programme. National air quality standards exist in relation to a number of air pollutants. Air Quality Management Areas (AQMA) are required to be designated where the air quality fails to meet the prescribed standards for certain pollutants. This	

is done through an order, made under the Environment Act 1995 (as amended by the Environment Act 2021). Kirklees currently has 7 AQMAs. - Where a local authority, like Kirklees, has any AQMAs, it is a statutory requirement for Kirklees Council to prepare and submit an Air Quality Action Plan (AQAP) to Defra, for appraisal, every 5 years. The previous AQAP is now past its 5 year lifespan and a new AQAP is required to be published by January 2027, in line with Defra's requirements. - Since the previous AQAP was approved, air quality has improved in Kirklees which resulted in the revocation of three AQMAs and the modification (reduction in size) of three other AQMAs in 2025. However, there remain seven Air Quality Management Areas within Kirklees Council's Borough and therefore it is a legal requirement that a new AQAP is submitted to Defra, detailing additional measures and initiatives, designed to achieve compliance with AQ objectives in these remaining AQMAs.	
Resource Implications: Approval of the action plan does not commit the Council to expenditure beyond existing approved budgets. Some measures are dependent on future funding decisions and delivery by external partners.	
Date signed off by <u>Executive Director</u> & name	David Shepherd, Executive Director for Place 23 July 2026 – draft for scrutiny
Is it also signed off by the Service Director for Finance?	Kevin Mulvaney, Service Director Finance (signoff not required for scrutiny)
Is it also signed off by the Service Director for Legal Governance and Commissioning (Monitoring Officer)?	Samantha Lawton, Director for Legal Governance and Commissioning (Monitoring Officer) (signoff not required for scrutiny)

Electoral wards affected: All

Ward councillors consulted: Ward member consultation to be carried out prior to Cabinet date

Public or private: Public

Has GDPR been considered? Yes, no personal data is contained within the report or Air Quality Action Plan.

1. Executive Summary

- Air Quality refers to the amount or concentration of certain pollutants in the air. These pollutants or chemical compounds in the air are defined in UK law because of their

potential to cause harm to human or environmental health. These pollutants are caused by natural as well as human behaviour, such as burning fossil fuels (such as combustion engine vehicles, heating and power generation), agricultural and industrial processes, as well as activity which produces fine particles.

- Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often less affluent.
- The UK Health Security Agency (formerly Public Health England) has estimated that the costs of air pollution in England to health and social care services could reach between £5.3 and £18.6 billion between 2018 and 2035¹. Kirklees Council is committed to reducing the exposure of people in Kirklees to poor air quality in order to improve health. There is also a statutory requirement for the council to do so.
- Under the Environment Act 1995 (as amended), the Council is required to monitor the air in its Borough for certain pollutants and periodically review and assess this air quality and compare against legally binding, health-based air quality standards (referred to as Air Quality [AQ] Objectives). Where air pollution levels exceed the AQ objectives, the Council is required to designate that locality as an Air Quality Management Area (AQMA). This process has been ongoing for over twenty years and resulted in the previous declaration of ten AQMAs within Kirklees, due to breaches (exceedances) of air quality objectives in those specific localities. This process is referred to as Local Air Quality Management (LAQM).
- LAQM is overseen by the Government's Department for Environment, Food and Rural Affairs (Defra). The Council submits an Annual Status Report (ASR) detailing progress with the measures within the AQAP, annually, along with the latest monitoring data. This is also a legal requirement.
- Following declaration of AQMAs, the Council is required to produce an Air Quality Action Plan (AQAP) setting out measures to reduce polluting emissions and subsequently improve air quality within our AQMAs and the wider Kirklees district. Under the Environment Act 1995 (as amended) the Council is required to revise its AQAP every five years.
- The success of the measures within previous plans, combined with national actions to improve air quality (e.g., replacement of older more polluting vehicles nationally with newer less polluting ones) has resulted in air pollution concentrations improving in many locations within Kirklees' Borough, such that they have fallen below the air quality

¹ Public Health England. Estimation of costs to the NHS and social care due to the health impacts of air pollution: summary report, May 2018

objectives in several of the AQMAs. This resulted in the full revocation of three AQMAs (AQMA 1, 2 and 4, at Cooper Bridge, Scout Hill (Dewsbury) and Birkenshaw respectively) and the amendment (reduction in size) of three others (AQMA 3, 7 and 10) in 2025. Despite these improvements across the borough, seven AQMAs remain:

AQMA 3 – Ainley Top (Lindley Ward)

AQMA 5 – Eastborough, Dewsbury (Dewsbury East Ward)

AQMA 6 – Edgerton (Greenhead Ward)

AQMA 7 – Liversedge (Heckmondwike Ward)

AQMA 8 – Outlane (Colne Valley West Ward)

AQMA 9 – Huddersfield Town Centre (mainly Dalton Ward, partly Greenhead; Crosland; Moor; and Netherton and Newsome Wards)

AQMA 10 – Thornton Lodge (Crosland Moor Ward)

- These areas remain the focus of the updated AQAP 2026-2031. These were designated because of exceedances of the nitrogen dioxide (NO₂) annual mean objective (40 µg/m³). Monitoring results show that several of the remaining AQMAs are currently meeting air quality objectives, reflecting continued improvement across Kirklees. However, in line with Defra requirements, further years of confirmed compliant monitoring data are required before the Council can consider formal revocation of these AQMAs. It is expected that, in line with current monitoring trends, further AQMAs will be revoked during the coming years.
- Two locations, however, continued to exceed the NO₂ annual mean objective (40 µg/m³) in 2023:
 - K7 Westgate, Huddersfield (AQMA 9): 44.9 µg/m³, and
 - K40 Leeds Road, Eastborough, Dewsbury (AQMA 5): 43.0 µg/m³
- Although monitoring data were also collected in 2024, network wide data capture fell below Defra's 75% requirement due to vandalism (a number of monitors being removed) and from contractor change resulting in late installation of new sites. The 2023 dataset has therefore been selected as the AQAP baseline, as it provides the most robust and reliable evidence for assessment. The use of the 2023 dataset meets Defra expectations to base action planning on the highest quality evidence available and does not affect the validity of the assessment.
- To understand the current sources of pollutant emissions within Kirklees AQMAs, the AQAP 2026-2031 has included a source apportionment assessment. This then enables consideration as to what measures or initiatives could be implemented to mitigate these sources of NO₂, so that NO₂ emissions can be reduced to meet the objective levels. Key findings:
 - Diesel cars are the dominant contributor in most AQMAs, accounting for 60-80% of road traffic NO₂.

- In AQMA 9 (Huddersfield Town Centre), buses are the primary source, contributing c.70% of NO₂ at Westgate (K7) due to high bus flows and canyon effects from the tall buildings at this location.
- HGVs and LGVs make smaller but locally significant contributions, varying by freight routes, and traffic patterns.

These results directly informed the preparation of the provisional list of measures, to reduce NO₂ levels, for consideration by the AQAP Steering Group.

- Having identified potential measures to mitigate NO₂ emissions, and in accordance with nationally published technical guidance, LAQM.TG22, a quantitative appraisal of the AQAP 2026-2031 measures was then used to determine whether it is worthwhile taking measures forward, i.e., would the measures result in the required reduction in NO₂. For Huddersfield Town Centre (AQMA 9), detailed dispersion modelling was carried out. The source apportionment results showed that, out of the two locations, with continued exceedances in 2023 (Westgate, Huddersfield and Leeds Road, Eastborough, Dewsbury), Westgate in Huddersfield Town Centre had the higher exceedance and more complex emission profile and street canyoning that would benefit from a detailed modelling exercise as part of the AQAP.
- Three scenarios to assess the impact of priority measures for reducing emissions from buses and diesel cars were selected for modelling. This decision was informed by the source apportionment results:
 Scenario 1 – Convert Bus fleet to 50% electric buses and 50% Euro VI buses.
 Scenario 2 – Convert Bus fleet to 100% Euro VI buses.
 Scenario 3 – Upgrade 31.5% of petrol and diesel cars to electric cars.

Based on 2025 fleet mix data from West Yorkshire Combined Authority, approximately 23% of the bus fleet in Kirklees is currently Euro V or older. Euro VI is the principal modern emissions standard currently applicable to much of the existing heavy-duty bus fleet and substantially limits emissions of nitrogen oxides and particulate matter compared with earlier Euro standards.

Dispersion modelling for each scenario was undertaken at the key exceedance location (K7, Westgate) to predict the annual mean NO₂ concentrations. The results were then compared against the National Air Quality Objective, to identify when compliance would be achieved in Kirklees. Assuming immediate implementation, the modelling indicates that compliance with the annual mean objective is projected to be achieved:

- Within 1 year under the mixed electric/Euro VI bus scenario
 - Within 2 years under the 100% Euro VI bus scenario.
 - Within 4 years under baseline and car only scenarios.
- Overall, the modelling shows that bus fleet upgrades deliver the largest and fastest reductions in NO₂ at our highest risk location and therefore remain the priority measure in

the AQAP. Car focused measures alone will not achieve compliance within the shortest possible time.

- For AQMAs 3, 5, 6, 7, 8 and 10, which show improving trends in the 2025 ASR, an alternative quantification has been used that confirms Scenario 3 (car emissions) delivers the greatest reductions in NO₂, consistent with source apportionment, and is sufficient for compliance at AQMA 5 (which continues to exceed the NO₂ annual mean objective (40 µg/m³), while bus measures have limited impact.
- The improvements in AQ will result in a public health benefit from residents and visitors within the AQMAs breathing air with lower pollution concentrations than in the past.

2. Information required to take a decision

2.1 Background

This Air Quality Action Plan (AQAP) has been produced as part of our statutory duties required by the Local Air Quality Management framework. It outlines the actions we will take to improve air quality in Kirklees between 2026 and 2031. The AQAP sets out how the local authority will exercise its functions in order to secure the achievement of the air quality objectives.

This action plan presented with this report is a draft version and following the decision by Cabinet to adopt the plan it will be finalised and published as soon as practical after the decision. The final adopted plan must be issued to Defra, via the Local Air Quality Management Portal.

The action plan will be implemented by Council services working with external partners. Modelling indicates that, subject to the timing and extent of delivery of the modelled measures, compliance at the relevant locations could be achieved within approximately one to four years. The assumptions, measures and anticipated timescales are set out in the action plan.

The relevant Air Quality Management Areas (AQMAs) addressed by this action plan are outlined below:

- AQMA 3 Ainley Top, declared 01/11/2017 for Nitrogen Dioxide (NO₂) exceedance;
- AQMA 5 Eastborough, declared 01/11/2017 for NO₂ exceedance;
- AQMA 6 Edgerton, declared 01/11/2017 for NO₂ exceedance;
- AQMA 7 Liversedge, declared 01/11/2017 for NO₂ exceedance;
- AQMA 8 Outlane, declared 01/11/2017 for NO₂ exceedance;
- AQMA 9 Huddersfield Town Centre, declared 01/11/2017 for NO₂ exceedance;
- AQMA 10 Thornton Lodge, declared 15/06/2019 for NO₂ exceedance.

In 2025 Kirklees revoked AQMA 1, 2 and 4, while AQMAs 3, 7 and 10 have been amended to reduce their size, due to significant and sustained improvements to air quality in these locations.

This action plan replaces the previous action plan which ran from 2019-2025¹. Projects delivered through the past action plan include:

- Completed delivery of OLEV (Office for Low Emission Vehicles) funded West Yorkshire Strategic Rapid Charger network for taxis and the general public.
- Kirklees Council have previously installed 34 Rapid Charging Bays within Kirklees, these being 17 Taxi Bays and 17 Public Bays.
- The ECO Stars Fleet Recognition Scheme.
- West Yorkshire regional PM_{2.5} source apportionment exercise to determine non-road PM_{2.5} emission sources within Kirklees and West Yorkshire.
- Procurement of PM_{2.5} sensors to determine PM_{2.5} and concentrations within Kirklees and West Yorkshire.
- Upgrade of the of the Cycle Offset Optimisation technique (SCOOT) Traffic Management System within AQMA 1 in 2023, resulting in a reduction of the pollutant concentrations by 12 µg/m³ and contributing to achieving sustained compliance in AQMA 1 and its subsequent revocation.

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often less affluent².

The UK Health Security Agency has estimated that the costs of air pollution in England to health and social care services could reach between £5.3 and £18.6 billion between 2018 and 2035. Kirklees Council is committed to reducing the exposure of people in Kirklees to poor air quality in order to improve health.

We have carried out a Source Apportionment assessment to understand the current sources of Nitrogen Dioxide (NO₂) emissions within Kirklees AQMAs. From this we have developed actions that can be considered under nine broad topics:

- Planning and policy
- Reducing emissions from buses
- Reducing emissions from cars
- Improving traffic flow
- Active travel
- Public transport
- Council fleet and workplace travel
- Taxis
- Public information and awareness

Our priorities are:

² **Air pollution in the UK** Royal College of Paediatrics and Child Health, “**Air pollution in the UK: position statement**,” RCPCH, accessed 4 June 2026, <https://www.rcpch.ac.uk/resources/air-pollution-uk-position-statement>.

Priority 1 – Reducing emissions from buses: we will work in partnership with West Yorkshire Combined Authority (WYCA) and local bus operators to deliver lower emission Euro VI buses and zero emission electric buses across Kirklees.

Priority 2 – Reducing emission from cars: we will expand the electric vehicle (EV) charging network, including rolling out on-street EV charging, prioritising locations where there are gaps, in addition to improving traffic flow, and encouraging use of active travel (walking, wheeling and cycling), public transport and other alternatives to private car use, by improving service offerings and infrastructure.

Priority 3 – Working with our communities to raise awareness and make changes that lead to cleaner air for everyone: we will hold events, publish information and engage with our local communities to improve understanding and awareness, ensuring two-way communication to deliver air quality improvements that benefit everyone. Such awareness campaigns will include anti-idling initiatives around schools etc.

In this AQAP, we outline how we plan to effectively tackle air quality issues within our control. However, we recognise that there are a large number of air quality policy areas that are outside of our influence (such as vehicle emissions standards) but for which we may have useful evidence, and so we will continue to work with regional and central government on policies and issues beyond Kirklees' direct influence.

In relation to the wider strategic context, the UK Government's Air Quality Strategy for England – Framework for local authority delivery³ "Poor Air Quality is the biggest environmental threat to public health". There is a clear legal as well as a population health improvement necessity to improve the borough's air quality by taking the actions outlined in the AQAP. These improvements will have many benefits beyond bringing the area into compliance with AQ Objectives, but improving health outcomes as well, which also has benefits on the economic health of society. The Air Quality Strategy for England goes on to say: "By making people less healthy, poor air quality harms productivity and increases costs to society through medical and social care. Reducing poor air quality has direct, proven economic benefits, in many cases even when the up-front cost of intervention is high."

The Air Quality Action Plan supports the wider 'Our Council Plan' shared outcomes such as 'Clean and Green' and 'Well' as well as a key supporting action plan for the delivery of top tier Partnership 'Environment Strategy'. The AQAP contributes to the Key theme of the Environment Strategy 'Kirklees on the Move'. The AQAP will be a supporting document to Kirklees' Transport Strategy and emerging Local Plan.

2.2 Cost breakdown

The overview of the delivery of the AQAP 2026-2031 will be within the existing budget for Air Quality, which is summarised below. The existing budget makes provision for the monitoring of air quality across the borough (a total of 92 locations) on a continual basis for NO₂. Some measures within the AQAP have existing budgetary allocations where relevant. Other currently unfunded actions will not be completed until satisfactory budget has been identified. This report does not commit the Council to any additional expenditure at this time.

³ Department for Environment, Food & Rural Affairs, "**Air quality strategy: framework for local authority delivery**," GOV.UK, accessed 4 June 2026, <https://www.gov.uk/government/publications/the-air-quality-strategy-for-england/air-quality-strategy-framework-for-local-authority-delivery>.

The AQAP outlines measures which fall within existing allocated budgets. Measures are also outlined in the action plan where existing budgets, either within the Council or with partner agencies, such as the Combined Authority, or National Highways are not set or allocated. Over the life of the AQAP, steps will be taken to make the required business cases for these actions to be implemented, where there is not a clear business case, and therefore, actions are not possible – this will be reported to Defra via the ASR process. This is in line with the normal practice of Air Quality action planning

Budget Information for Air Quality

Employee costs:	£112,875
Supplies & Services for air monitoring:	£11,871
Total Net Controllable Expenditure:	£124,746.

2.3 Timescale

Defra's deadline for the submission of the final AQAP 2026-2031 is within six months of its appraisal of the draft AQAP being returned to the Council. The Draft AQAP was submitted to Defra in May 2026, Defra returned its appraisal in July 2026 approving the plan, with some minor technical suggested amendments. These amendments have been implemented where practical and incorporated into the revised draft action plan presented with this report. Therefore, final submission of the adopted amended action plan is January 2027

Subject to Cabinet approval, this will be achieved. The measures and initiatives contained within the AQAP will be ongoing over the next five years. Achievement of the AQ objectives through the completion and/or implementation of these measures shall be reported on annually through the Annual Status Report (ASR).

2.4 Expected impact/ outcomes, benefits & risks

The expected impact of the AQAP is a positive, measurable improvement in air quality across the Borough, but particularly within the AQMAs, as a result of the measures and initiatives and priorities identified. Whilst the focus of an AQAP is upon AQMAs, it is expected that the implementation of the initiatives and priorities will also positively impact on air quality in the neighbouring and wider localities beyond the AQMAs boundaries.

As exposure to air pollution is a human health impact, improvements in air quality, especially to limit exposure to below the national objectives will have a population health improvement. Improvements in population health and the corresponding economic benefit this brings is a key objective of the AQAP and LAQM framework.

Key risks associated with the delivery of the action plan are measures within the plan where budgets are not yet allocated or where delivery is reliant on bodies external to the Council. These risks will be mitigated through close working with partners to achieve shared outcomes, such as identifying budgets through business cases. Where this isn't possible the action plan will be reviewed and revised – updates to Defra will be via the Annual Status Report each year.

2.5 Evaluation

The success of the AQAP will be measured by the continuing Borough-wide monitoring of NO₂ and with specific reference to the air quality in AQMAs. The aim is to reduce NO₂ in all areas to below the national, annual mean objective of 40 µg/m³ and ultimately revoke all remaining AQMAs.

2.6 Sustainability

Air quality improvements are closely aligned with wider sustainability objectives, with many of the measures and initiatives designed to tackle air pollution also contributing to broader environmental goals. For example, this includes collaboration with transport planning to promote active travel and reduce reliance on private vehicles, as well as enhancements to public transport, such as the transition to a lower-emission bus fleet.

2.7 Services & agencies involved

Whilst the AQAP 2026-2031 is developed and overseen by the Air Quality team in Environmental Health, the implementation will require the input of a number of internal and external stakeholders, namely Kirklees Highways (transport planning, highways engineers etc.); Kirklees Public Health and the West Yorkshire Combined Authority in relation to the bus fleet etc.

3 Implications for the Council

Improved air quality is of benefit to all. Poor air quality is associated with several health conditions, such as respiratory and cardiovascular disease. Any improvement in outdoor air quality will have positive impact on our health. The AQAP 2026-2031 aims to further improve outdoor air quality and will ensure Kirklees Council meets its statutory obligations relating to Local Air Quality Management, under the Environment Act 1995 (as amended).

3.1 Council Plan

Improved air quality supports a wide range of objectives set out in the Council Plan. In particular, working with other Council departments and external stakeholders as well as focusing resources on actions/initiatives to improve air quality in the remaining AQMAs, also meets the objectives of 'working smart and delivering efficiently', as detailed within the Council's Plan for 2026-28. Furthermore, the AQAP and the proposed measures, to improve air quality, link closely with a number of the 'shared outcomes' of the Council Plan: Clean and Green, Well; Safe and Cohesive.

Alignment with the Environment Strategy has been noted earlier in this report. Of equal importance is the contribution of improved air quality to the aims of the Councils' Health and Wellbeing Strategy.

3.2 Financial Implications

Approval of this report does not itself authorise expenditure beyond existing approved budgets. Some action-plan measures are dependent on future Council, combined-authority, operator or external funding. Any additional Council expenditure will be subject to the normal business-case and budget-approval processes.

3.3 Legal Implications

Local Air Quality Management (LAQM) is a regulatory function of the Council and is governed by provisions within the Environment Act (EA)1995 (as amended). Councils have a legal responsibility to carry out various duties in relation to Local Air Quality Management.

The Council has a statutory duty under the Environment Act 1995, the Act, to regularly review and assess local air quality in their area against national air quality targets and to take action where poor air quality breaches these air quality targets. The Council can designate by order, an AQMA where there is evidence that national air quality standards are not met.

Where AQMAs are designated, under Section 83A of the Act, *“a local authority must, for the purpose of securing that air quality standards and objectives are achieved in an air quality management area designated by that authority, prepare an action plan in relation to that area. An action plan is a written plan that sets out how the local authority will exercise its functions in order to secure that air quality standards and objectives are achieved in the area to which the plan relates”*.

The approval and submission of the AQAP 2026-2031 by Cabinet does not introduce any additional legal implications beyond existing statutory requirements. However, failure to submit the AQAP 2026-2031 within six months of receiving Defra’s appraisal of the draft action plan, could result in ‘enforcement’ action by Defra.

It should be noted that there is an ‘enforcement mechanism’ led by Defra in situations where local authorities do not comply with their duties under LAQM. This enforcement mechanism starts with advice and warning letters from the department and culminating in a ‘Ministerial Direction’. Ministerial Directions would normally place additional legally binding duties on local authorities – specifically to ensure compliance with their obligations.

As well as the reputational damage to the Council in not meeting its duties, additional and more onerous duties may be imposed. Risk of judicial review of the Council in not meeting its duties would also increase.

The discharge of functions relating to the control of pollution and the management of air quality are a “Local Choice” function under the Council’s Constitution and responsibility sits with the Executive (Cabinet).

3.4 Climate Change and Air Quality

The proposed AQAP 2026-2031 aims to build on the improvements in the reduction of air pollutants, since the last AQAP. The revocation and amendment of some AQMAs in 2025, demonstrated that emissions of some air pollutants (namely NO₂) had sufficiently reduced to enable that course of action to be taken. This had been achieved due to measures to improve air quality contained within previous Council AQAPs, along with the success of national measures to improve air quality.

The AQAP 2026-2031 will aim to further improve air quality by identifying proposed and ongoing measures and strategies to reduce emissions, particularly associated with buses and other vehicles.

Some measures within the action plan, particularly vehicle electrification, active travel, public-transport use and reduced reliance on private cars, may also reduce greenhouse-gas emissions. Other measures, such as upgrading combustion-engine vehicles to newer emissions standards, may deliver substantial local air-quality benefits without producing an equivalent reduction in carbon emissions.

Although the AQAP is not specifically designed to mitigate against climate change many of the measures to improve air quality also have beneficial impacts on greenhouse gas emissions. Especially in the areas of transport – where measures are implemented to move away from fossil fuel powered vehicles.

3.5 Risk, Integrated Impact Assessment (IIA) or Human Resources

There is limited risk associated with the proposed actions contained in this report and the AQAP. There is potential, greater risk associated in not undertaking the above-described course of action. Failure to do this will result in the Council being in breach of the overall requirements of Local Air Quality Management, by failing to submit an AQAP. The consequences could be that Defra considers issuing a ministerial direction to the Council. This could also have significant reputational damage.

There are no human resources implications.

There is no impact on the armed forces community in terms of healthcare, housing, and/or education (as required under the Armed Forces Covenant), except that improved air quality will benefit members of this community, within AQMAs, as well as the wider Kirklees population

The overall proposal is a positive impact for all residents/visitors to Kirklees. An Integrated Impact Assessment (IIA) has been completed reference: IIA-844083491 (<https://www.kirklees.gov.uk/beta/delivering-services/integrated-impact-assessments/home/details/IIA-844083491/>). Improved air quality benefits all, particularly those sectors of the population more susceptible to the impact of air pollution. This includes the very young and old, along with those with pre-existing conditions (e.g., asthma) more vulnerable to poor air quality. The IIA concludes there are no adverse discriminatory or environmental impacts to the Kirklees public, including protected characteristic groups as defined under the Public Sector Equality Duty of the Equality Act 2010. There is likely to be a positive impact to some persons with a protected characteristic. Potential beneficial links with carbon reduction and local air quality management are discussed elsewhere in this report.

4 Consultation

Schedule 11 to the Environment Act 1995 sets out the statutory consultees that a Local Authority must consult when preparing or revising an Air Quality Action Plan. In accordance with these requirements, the Council has circulated the draft AQAP to relevant statutory consultees including the Environment Agency, West Yorkshire Combined Authority, the

Peak District National Park Authority, neighbouring authorities including Barnsley, Wakefield, Leeds, Bradford and Calderdale, National Highways and the Chamber of Commerce (representing local businesses). The draft AQAP was submitted to Defra via the LAQM portal for appraisal and review by the Secretary of State. To date – no official response has been received from any of the statutory consultees.

In addition to the statutory consultation, a public consultation was undertaken (between the 2nd – 31st March 2026) to gain views from the public on the shortlist of actions established by the steering group (see section 5 below). 72 responses were made following this consultation exercise, of the 72 responses received, they broadly supported the Plan's focus on reducing traffic related emissions in the remaining AQMAs. The consultation highlighted additional concerns around domestic wood burning and vehicle idling, these issues are already addressed within the AQAP's awareness and behaviour change measures and do not warrant any change to the Plan's overall strategic direction.

The public consultation period was shortened because of the pre-election period. The Council sought advice from the Local Air Quality Management Helpdesk, which confirmed that the consultation undertaken was sufficient to support appraisal of the draft Air Quality Action Plan. The draft plan was submitted to Defra in May 2026 and appraised in July 2026. Defra proposed a number of minor technical amendments, which have been incorporated where appropriate. Defra did not require any further public consultation as part of its appraisal.

5 Engagement

A Steering Group was established in line with LAQM.TG(22) to aid the development of the AQAP. Environmental Health (EH) held a cross-council engagement activity in January 2026, followed by a February Steering Group workshop to review and appraise the long list of potential measures and agree a deliverable shortlist.

The final AQAP therefore brings forward a targeted package of measures across traffic, active travel, planning and policy, council fleet and public information to address the remaining NO₂ hotspots and support borough wide improvement. This will require the ongoing engagement of stakeholders to deliver on the measures and initiatives contained in the AQAP 2026-2031.

6 Options

6.1 Options considered

As the preparation and submission of an AQAP is a legal duty as outlined above the option not to prepare an AQAP was not considered by officers.

The options available to Cabinet:

Option 1:

- Cabinet notes the contents of the report, the improvement in air quality across Kirklees and the technical evidence supporting the priorities contained in the Air Quality Action Plan 2026–2031.
- Cabinet notes the statutory and public consultation undertaken, the representations received and the Council's response.

- Cabinet approves the Kirklees Air Quality Action Plan 2026–2031 appended to the report.
- Cabinet delegates authority to the Head of Public Protection to make any non-material textual, technical or presentational amendments required before submission or publication.
- Cabinet authorises the Head of Public Protection to submit the adopted Air Quality Action Plan to the Department for Environment, Food and Rural Affairs through the Local Air Quality Management portal and to arrange for its publication on the Council's website.

Option 2:

- Cabinet to reject the AQAP as drafted
- Cabinet to direct officers to redraft the action plan
- Cabinet to delegate authority to Head of Public Protection to engage with Defra regarding any delays to submission of the AQAP as currently required

It is recommended that Cabinet take 'Option 1'

6.2 Reasons for recommended option

Monitoring data, detailed technical modelling and source apportionment analysis has identified the key sources contributing to air pollution within the AQMAs. Discussion with key stakeholders on potential measures to tackle these sources have identified three key priorities. The key priorities for the action plan are:

- (i) Priority 1 – Reducing emissions from buses
We will work in partnership with West Yorkshire Combined Authority (WYCA) and local bus operators to deliver lower emission Euro VI buses and zero emission electric buses across Kirklees.
- (ii) Priority 2 – Reducing emission from cars
We will expand the electric vehicle (EV) charging network, including rolling out on-street EV charging, prioritising locations where there are gaps, in addition to improving traffic flow, and encouraging use of active travel (walking, wheeling and cycling), public transport and other alternatives to private car use, by improving service offerings and infrastructure.
- (iii) Priority 3 – Working with our communities to raise awareness and make changes that lead to cleaner air for everyone
We will hold events, publish information and engage with our local communities to improve understanding and awareness, ensuring two-way communication to deliver air quality improvements that benefit everyone. Such awareness campaigns will include anti-idling initiatives, including targeted activity around schools.

From the information contained in this report, the technical data and analysis contained in the AQAP, as well as the advice and recommended action from officers, the measures contained in the AQAP are sufficient to comply with the Council's duties to reduce air pollution and improve air quality in the borough and to bring the AQMAs into compliance in the shortest possible time.

7 Next steps and timelines

To ensure the Council meets its statutory obligations, the AQAP needs to be considered by Cabinet, and if approved, submitted without delay to meet Defra's submission requirements. The Air Quality Action Plan shall be submitted by January 2027. The following steps will then be taken:

Ongoing Delivery and Reporting

- Maintain delivery of existing AQ-beneficial projects already underway (transport schemes, EV infrastructure, fleet decarbonisation and active travel etc).
- Report on progress of AQAP measures in the Annual Status Reports (ASR), issued to Defra in June each year, as required under the LAQM framework.
- Annual meeting of AQAP Steering Group to monitor and deliver on actions within the plan.

Activities Commencing Now (Parallel to AQAP Finalisation)

- Continue discussions with WYCA on the delivery of bus related measures, including Euro VI upgrades and zero emission bus transition.
- Progress targeted public engagement activity on smoke control and anti-idling

8 Contact officer

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9 Background Papers and History of Decisions

- Local Air Quality Management Policy and Technical Guidance LAQM.PG22 & TG22. August 2022. (Published by DEFRA).
- Air Quality Strategy – Framework for Local Authority Delivery. August 2023. Published by DEFRA.
- Kirklees Council, Air Quality Action Plan, 2019-24, <https://www.kirklees.gov.uk/beta/crime-and-safety/pdf/air-quality-action-plan.pdf>
- 2019 Decision to adopt Air Quality Action Plan 2019-2024 <https://democracy.kirklees.gov.uk/ieDecisionDetails.aspx?ID=8382>
- Kirklees Council, Air Quality Annual Status Report, 2025 www.kirklees.gov.uk/beta/crime-and-safety/pdf/kirklees-annual-status-report-2025.pdf
- Kirklees Air Quality Management Areas webpage <https://www.kirklees.gov.uk/beta/crime-and-safety/air-quality-management-areas.aspx>
- 2025 Cabinet Decision to review Air Quality Management Areas <https://democracy.kirklees.gov.uk/ieDecisionDetails.aspx?ID=12910>

10 Appendices

Appendix 1: Kirklees Air Quality Action Plan 2026-2031 (draft)

11 Service Director responsible

Katherine Armitage, Service Director Environmental Strategy and Climate Change

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